

REMARKS

Favorable reconsideration of this application, as present amended and in light of the following discussion, is respectfully requested.

Claims 1-3, 5-9, 11, 12, 14, 15, 17-27, 29-32, 34, 36, 38, and 39 are currently pending. Claims 1, 7, and 19-25 have been amended; and Claims 38 and 39 have been added by the present amendment. The changes and additions to the claims are supported by the originally filed specification and do not add new matter.

In the outstanding Office Action, Claims 1-3, 5-9, 11, 12, 25-27 and 29-37 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,833,865 to Fuller et al. (hereinafter “the ‘865 patent”) in view of U.S. Patent No. 7,139,467 to Seo et al. (hereinafter “the ‘467 patent”); and Claims 14, 15, and 17-24 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the ‘865 patent and the ‘467 patent, further in view of U.S. Patent Application Publication No. 2002/0041754 to Kikuchi et al. (hereinafter “the ‘754 application”).

Amended Claim 1 is directed to a method of compressing and recording data of image information on a recording medium according to a decoding and reproducing unit comprising a plurality of frames, the method comprising: (1) performing compression of inputted image data; (2) generating additional information about the inputted image data; and (3) multiplexing an additional information block that includes the additional information generated in the generating step at a block position immediately after a pack that contains reproduction management information of the inputted image data and immediately before a group of blocks that include compressed image information processed by compression encoding through the use of only image information in the decoding and reproducing unit, and recording the additional information block on the recording medium, wherein the additional information that is multiplexed and recorded on the recording medium

includes at least application information, recording time information, and camera information, and the application information includes a vendor name as a manufacturer of a product, and a product name. The changes to Claim 1 are supported by the originally filed specification and do not add new matter.¹

The '865 patent is directed to an integrated data and real-time metadata capture system, comprising: (1) a digital capture device producing a digital representation of one or more forms of media content; (2) a feature extraction engine configured to automatically extract metadata in real time from the digital content simultaneously with encoding of the content; (3) a storage device configured to store the encoded media content in the metadata; and (4) an output interface in communication with the storage device to generate output data while preserving a temporal relationship between a sequence of the metadata and additional content. As shown in Figure 1, the '865 patent also discloses a collateral data input unit storing metadata related to the device state, which can be formatted with the content data. Further, the '865 patent discloses that the device data information can include lens properties, enclosure values, f-stops, and audio gains. Further, the '865 patent discloses that the metadata may be combined with the content data using the MPEG-7 format or in other formats such as Apple QuickTime.²

However, as admitted in the outstanding Office Action, the '865 patent fails to disclose the step of multiplexing an additional information block that includes the additional information at a block position immediately after a pack that contains reproduction management information of the imported image data, as recited in Claim 1.

Further, Applicants respectfully submit that the '865 patent fails to disclose that the application information, which is part of the additional information that is multiplexed and

¹ See e.g., previous Claim 33 and Figure 6.

² See '865 patent, column 6, lines 13-22.

recorded on the recording medium, includes a vendor name as a manufacturer of the product, and a product name, as recited in amended Claim 1. In this regard, Applicants note that amended Claim 1 requires that the application information includes both a vendor name and a product name. In this regard, Applicants note that, regarding the rejection of Claim 33, the Office Action relies on column 1, lines 46-67 in the '865 patent as disclosing this limitation. However, Applicants note that, while that passage in the Background section of the '865 patent does include the word "vendors," **the passage does not say anything about multiplexing an additional information block and recording the additional information block on a recording medium, wherein the additional information includes application information that includes a vendor name and a product name**, as required by Claim 1. Rather, the '865 patent merely uses the word "vendor" in the context of Digital Media Asset Management systems, such as Cinebase, WebWare, and EDS/Media Vault, which are software products available from various vendors. The '865 patent discloses that such Digital Media Asset Management systems are used to perform storage and management functions in digital production environments. In other words, the '865 patent merely discloses various **software products** available from various vendors. **The '865 patent is silent regarding multiplexing and recording a vendor name and a product name on a recording medium, as required by Claim 1.** Rather, the Background section of the '865 patent merely discloses the existence of various software programs that perform digital media asset management functions. However, Claim 1 requires the recording of vendor and product information in a particular place on a recording medium. The reference in the Office Action to column 1 of the '865 patent appears to be based only upon the existence of the word "vendors" in the passage, but is unrelated to the limitations recited in Claim 1.

Further, the comments in the Advisory Action fail to address Applicant's argument that the '865 patent fails to disclose multiplexing and recording the vendor and product name.

Rather, the Advisory Action merely implies that the '865 patent mentions a software product made by a manufacturer and thus meets the claimed limitation. However, Claim 1 requires multiplexing and recording of this information.

The '467 patent is directed to a method and apparatus of providing supplemental service information for audio/video content written in a recording medium. In particular, the '467 patent discloses that the method includes the steps of reproducing the audio/video data and language formatted data from a recording medium; checking a packet identifier of each transport packet reproduced from the recording medium; discriminating language-formatted data packets from audio/video data packets based on the checked packet identifier; and transmitting the reproduced audio/video data and language-formatted data to a connected external apparatus through a digital interface. As shown in Figure 7, the '467 patent discloses that the hierarchical data structure of an HD-DVD thus includes navigation data, ATVEF data and A/V data.

However, Applicants respectfully submit that the '467 patent fails to disclose multiplexing an additional information block that includes additional information generated in a generating step at a block position immediately after a pack that contains reproduction management information of the inputted image data and immediately before a group of blocks that includes compressed image information compressed by compression and coding, wherein **the additional information that is multiplexed and recorded on the recording medium** includes at least application information, recording time information and camera information, and the application information includes a vendor name as a manufacturer of a product, and a product name, as recited in amended Claim 1. The '467 patent is silent regarding the **vendor and product names** recited in amended Claim 1. Further, Applicants respectfully traverse the assertion that it is an inherent feature that the navigation data

disclosed by the '467 patent contains reproduction management information of the input image data, as required by Claim 1.

Thus, no matter how the teachings of the '865 and '467 patents are combined, the combination does not teach or suggest multiplexing an additional information block that includes the additional information, wherein the additional information that is **multiplexed and recorded on the recording medium** includes application information, recording time information, and camera information, and the application information includes a vendor name as a manufacturer of a product, and a product name, as recited in amended Claim 1.

Accordingly, Applicants respectfully submit that the rejection of Claim 1 (and all associated dependent claims) is rendered moot by the present amendment to Claim 1.

Independent Claims 7 and 25 recite limitations analogous to the limitations recited in Claim 1. Moreover, Claims 7 and 25 have been amended in a manner analogous to the limitations in Claim 1. Accordingly, for the reasons stated above, Applicants respectfully submit that the rejections of Claims 7 and 25 (and all associated dependent claims) are rendered moot by the present amendment to Claims 7 and 25.

Independent Claims 19-24 recite limitations analogous to the limitations recited in Claim 1. Further, Claims 19-24 have been amended in a manner analogous to the amendment to Claim 1. Regarding the rejection of independent Claims 19-24, Applicants note that the Office Action relies upon the '754 application as disclosing "reading compressed image information according to the decoding and reproducing unit from the recording medium, decompressing the compressed information image, and reproducibly outputting image information according to the decoding and reproducing unit...", as well as extracting additional information contained in the decoding and reproducing unit. However, Applicants respectfully submit that the '754 application fails to disclose that the application

information includes a vendor name as a manufacturer of a product, and a product name, as
recited in amended Claims 19-24.

Thus, no matter how the teachings of the '754 application, the '865 patent, and the '467 patent are combined, the combination does not teach or suggest the multiplexing and recording of the application information that includes a vendor name as a manufacturer of a product, and a product name, as recited in independent Claims 19-24. Accordingly, for the reasons stated above, Applicants respectfully submit that the rejections of Claims 19-24 are rendered moot by the present amendment to those claims.

Regarding the rejection of dependent Claims 14, 15, and 17 under 35 U.S.C. § 103(a), Applicants respectfully submit that the '754 application fails to remedy the deficiencies of the '865 patent and the '467 patent, as discussed above. Accordingly, Applicants respectfully submit that the rejections of dependent Claims 14, 15, and 17 are rendered moot by the present amendment to Claim 19.

The present amendment also sets forth new dependent Claims 38 and 39 for examination on the merits. New Claims 38 and 39 are supported by Figure 6. New Claim 39 clarifies that the application information includes an application identifier and manufacture information, in addition to the vendor name and model name. Applicants respectfully submit that new Claims 38 and 39 patentably define over any proper combination of the '865 and '467 patents.

Thus, it is respectfully submitted that independent Claims 1, 7, and 19-25 (and all associated dependent claims) patentably define over any proper combination of the '754 application, the '865 patent, and the '467 patent.

Consequently, in view of the present amendment and in light of the above discussion, the outstanding grounds for rejection are believed to have been overcome. The application as amended herewith is believed to be in condition for formal allowance. An early and favorable action to that effect is respectfully requested.

Respectfully submitted,

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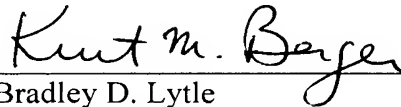
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A handwritten signature in cursive script, reading "Kurt M. Berger", is written over a horizontal line.

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